

From: [Brown, Mike](#)
To: ["Kanwit, Thomas \(USAMA\)"; Sady, Michael \(USAMA\)](#)
Cc: [Butts, John](#); [Pirozzolo, Lisa](#); ["Oren Sellstrom"](#); [Michael Wishnie](#)
Subject: RE: Savino v. Souza - Requests for Inspection
Date: Thursday, July 23, 2020 5:26:15 PM

Hi Thom,

Thanks for the response. As described in the requests, the notice is to, among other things, give us the opportunity to see and document the conditions and layout of the locations where our clients are held. That is fundamental to our claims, and well within the bounds of Rule 26. Although we will listen in good faith to any concerns you have, we do not see any meaningful burden to the defendants.

We also read Rule 34 as requiring a response within 30 days and are willing to discuss a reasonable time for the inspection.

Best,
Mike

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From: Kanwit, Thomas (USAMA) <Thomas.Kanwit@usdoj.gov>
Sent: Thursday, July 23, 2020 1:56 PM
To: Brown, Mike <Mike.Brown@wilmerhale.com>
Cc: Sady, Michael (USAMA) <Michael.Sady@usdoj.gov>
Subject: RE: Savino v. Souza - Requests for Inspection

EXTERNAL SENDER

Mike-

I have reviewed the requests for inspection and am discussing them with my clients. As you

probably anticipated, there are issues/objections. Before we discuss them specifically, please provide a description of what it is you are trying to accomplish with the inspection. Without that I cannot evaluate the burden versus the discovery objective.

Also, my understanding of the rule is that our response is due within 30 days. Not clear to me that we have to allow the inspection within that time. That may or may not be an issue we have to discuss; there are bigger concerns here.

Thanks.

Thom

Thomas E. Kanwit
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From: Brown, Mike <Mike.Brown@wilmerhale.com>
Sent: Tuesday, July 14, 2020 12:11 PM
To: Kanwit, Thomas (USAMA) <TKanwit@usa.doj.gov>; Sady, Michael (USAMA) <MSady@usa.doj.gov>
Cc: Pirozzolo, Lisa <Lisa.Pirozzolo@wilmerhale.com>; Butts, John <John.Butts@wilmerhale.com>; Oren Sellstrom <osellstrom@lawyersforcivilrights.org>; Michael Wishnie <michael.wishnie@ylsclinics.org>
Subject: Savino v. Souza - Requests for Inspection

Counsel,

Please find attached Plaintiffs' Requests for Inspection in *Savino v. Souza*, Case No. 20-cv-10617.

Best,
Mike

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